

June 11, 2004

Federal Communications Commission

One of the major frustrations that we have felt as operators of WUFT-FM and WJUF-FM is the overabundance of excellent program and the fact that we have been restricted to just 24 hours in a broadcast day. We are the sole public broadcasting entity for parts of 27 counties in the North Central Florida region and we are constantly having to decide and justify why we put some programs on the air and leave others off of the air. Our greatest frustration has been the friction that we feel from the fact that we provide classical music, news and public affairs programs, jazz and a number of niche programs to this larger community. Since we only have one high-power frequency in this market (we have looked for others but none are available that duplicate our 100,000 watt coverage area and we did manage to find a 21,000 watt frequency for a repeater station in Citrus county) we have provided a compromise service that provides some music, some news and some niche programming (local and national). One of the most exciting aspects of HD radio is its potential to provide compact disc quality programming on two broadcast streams at the same time. We will be able to double our programming service to the region. HD radio will make it possible for us to serve both major groups of listeners more fully. When we are broadcasting talk on one stream we can be counter-programming ourselves with music on the other. Or, if the coverage area is comparable for both streams we could move the music to one stream and then program a local and national talk service on the other. We currently produce 75 minutes of local news coverage each day that can be expanded with the increase in local news hours that will be made available to us through the adoption of a second broadcast audio stream.

The lack of spectrum or the fact that major corporations have purchased so much of the existing spectrum has been a major contribution to the demise of variety and choice in terrestrial radio broadcasting. HD radio with an authorized second stream will double the available spectrum and allow us to better serve our major audience constituencies.

We were gearing up to apply for the last round of digital conversions but came up \$20,000 short of having the project funded. This opportunity came up in mid fiscal year so it wasn't possible to pull the funding together to make that round. However, we have gotten commitments from our college that will, in combination with the money available to us from the Corporation for Public Broadcasting, allow us to make the conversion to HD broadcasting in the next fiscal year.

The addition of the second audio stream to our current signal means we won't have to go through the extremely competitive and expensive process of filing for additional frequencies that would allow us to provide the same service opportunities that HD will allow. Since we already know that no additional high power frequencies are available this is the only way that we can expand our on air service to this region and begin to meet the needs expressed by our current audience members. The supplemental audio channel is the most efficient way for the Federal Communications Commission to allow us to increase the diversity of programming available to listeners in our market and the realize the need for diverse voices on the radio spectrum in America.

Beyond the immediate benefit of doubling the broadcast hours we can present to our community we will also be able to offer other information streams to our listeners and provide new services that we are just beginning to comprehend.

If the Federal Communications Commission sees fit to authorize the use of supplemental audio channels for digital radio broadcasters you will create one of the greatest increases in audience service (at least from the public radio perspective) since the F.C.C. began licensing radio stations.

Henri Pensis
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WUFT-FM/WJUF-FM